

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE AUTOMOTIVE PARTS : Master File No. 12-md-02311
ANTITRUST LITIGATION : Honorable Marianne O. Battani

ALL PARTS

THIS DOCUMENT RELATES TO:
ALL CASES

**SECOND SUPPLEMENT TO MOTION TO MODIFY
STIPULATED ORDER OF DISCOVERY**

End-Payor Plaintiffs (“EPPs”) hereby provide this second supplement to their motion to modify the stipulated order of discovery of August 21, 2014 (ECF No. 783), which was first supplemented on August 27, 2014 (ECF No. 789).

The motion had identified JTEKT Corporation (“JTEKT”) as a defendant with whom EPPs were unable to meet and confer. After ECF No. 789 was filed, counsel for JTEKT (“JTEKT”) Corporation contacted counsel for EPPs for the first time to suggest that the statement that JTEKT had not met and conferred with EPPs was incorrect. According to JTEKT’s counsel, it participated in an open conference call with four other guilty-pleading defendants. Neither EPPs’ recollection nor records reflect that JTEKT attended the meet and confer call, and counsel for JTEKT did not express any statement concerning the relief requested

by EPPs. In the spirit of cooperation, however, EPPs agree to state that we met and conferred with JTEKT, which did not consent to the relief we sought.

Date: August 28, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Steven N. Williams, hereby certify that I caused a true and correct copy of the **SECOND SUPPLEMENT TO MOTION TO MODIFY STIPULATED ORDER OF DISCOVERY** to be served via e-mail upon all registered counsel of record via the Court's CM/ECF system on August 28, 2014.

/s/ Steven N. Williams
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